

**BEFORE THE**  
**Federal Communications Commission**  
**WASHINGTON, D.C.**

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APR 12 1996

In the Matter of )

Federal-State Joint Board )  
on Universal Service )

CC Docket No. 96-45

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**COMMENTS OF THE GUAM PUBLIC UTILITY COMMISSION**

The Guam Public Utility Commission ("Guam PUC"), by its attorneys, hereby submits its comments in the above captioned proceeding instituted by the Federal Communications Commission ("FCC" or "Commission") on March 8, 1996.<sup>1</sup> The NPRM was released to implement Section 254 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996.<sup>2</sup>

<sup>1</sup> Federal-State Joint Board on Universal Service, Notice of Proposed Rulemaking and Order Establishing Joint Board, CC Dkt. No 96-45, FCC 96-93 (March 8, 1996) ("NPRM").

<sup>2</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) ("1996 Act").

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The Guam PUC's objective in this proceeding is to insure that the benefits of the Universal Service support mechanisms available to citizens in the continental United States are also made available to Guam citizens on a non-discriminatory basis.<sup>3</sup>

Section 254(b) of the 1996 Act establishes certain principles on which the Joint Board and the Commission are to base their policies for the "preservation and enhancement of universal service, " including: 1) the provision of "quality services" at "just, reasonable, and affordable rates"; 2) nationwide access to "advanced telecommunications and information services"; 3) access by consumers in "rural, insular, and high cost areas" to telecommunications and information services "reasonably comparable" to those in "urban" areas and at rates that are "reasonably comparable" to "urban" rates; 4) adoption of a requirement that all providers of telecommunications services make "equitable and nondiscriminatory" contributions to the preservation of universal service ; 5) establishment of "specific and predictable mechanisms to provide adequate and sustainable support for universal service"; 6) access to advanced services for healthcare providers, schools, and libraries; and 7) such

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<sup>3</sup> The GPUC considers the Commission's effort in this proceeding as complementary to the Commission's commitment to bring geographic rate averaging to Guam; see Policy and Rules Concerning the Interstate Marketplace: Implementation of Section 254(g) of the Communications Act, Notice of Proposed Rulemaking at para. 77, CC Docket No. 96-61, FCC 96-123 (March 25, 1996).

other principles as the Joint Board determines are necessary and appropriate for the protection of the public interest, convenience, and necessity, consistent with the purposes of the Act.


Of particular interest to the GPUC is Section 254(b)(3) which requires access by consumers in "rural, insular, and high cost areas" to telecommunications and information services "reasonably comparable" to those in "urban" areas and at rates that are "reasonably comparable" to "urban" rates. As the Commission noted in the NPRM, Congress specifically intended "insular" areas to include the Pacific Island territories.<sup>4</sup> Thus, Guam citizens should be afforded all the benefits envisioned in Section 254, including access to all "universal services" identified by the Commission in this proceeding and at rates that are "reasonably comparable" to "urban" rates.

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<sup>4</sup> NPRM at n. 15; see also, S. Conf. Rep. No. 104-230, 104th Cong., 2d Sess. at 131.

The GPUC looks forward to further participation in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. A. Finley', written over a horizontal line.

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I, Catherine M. DeAngelis, do hereby certify that on this 12th day of April, 1996, copies of the foregoing "Comments of Guam Public Utilities Commission" were delivered by first class mail, postage prepaid, or hand delivered to the following parties:

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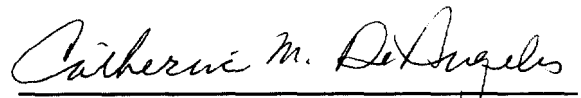
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